

Bruce P. Fromer, Esq.
Attorney ID# 009271983
Nelson, Fromer, Crocco & Jordan
2300 Route 66, Suite 102
Neptune, NJ 07753
Phone: (732) 774-6443
Fax: (732) 774-7155
Attorneys for Plaintiff

PATRICIA PALMER;	:	UNITED STATES DISTRICT COURT
	:	DISTRICT OF NEW JERSEY
	:	TRENTON VICINAGE
Plaintiff,	:	
	:	CIVIL ACTION NO.:
vs.	:	Civil Action
U.S. AIR FORCE;	:	COMPLAINT, DEMAND FOR JURY
ARNOLD C. YOUNG ;	:	TRIAL, AND DESIGNATION OF
JOHN DOE I-V; JANE DOE I-V;	:	TRIAL COUNSEL
ABC, Inc., fictitious names;	:	
Defendants.	:	

Plaintiff, PATRICIA PALMER, residing at 401 West Sylvania Avenue, Apt. #36B, in the Township of Neptune, County of Monmouth, in the State of New Jersey, complaining of the defendants, hereby says:

JURISDICTION AND VENUE

1. This action is brought pursuant to the negligent acts of Defendants herein. Jurisdiction is based upon 28 U.S.C. Section 1346, in that the matter in controversy is between parties of which the defendant is an employee of the U.S. Air Force.
2. Plaintiff, Patricia Palmer, is a citizen of the State of New Jersey and resides at 401 West Sylvania Avenue, Apt. #36B, in the Borough of Neptune City, County of Monmouth and State of New Jersey.
3. Defendant, Arnold C. Young, is a citizen of the State of New Jersey but is a member of the U.S. Air Force and was operating a vehicle owned by the U.S. Air Force at the time of the accident.

Bruce P. Fromer, Esq.
Attorney ID# 009271983
Nelson, Fromer, Crocco & Jordan
2300 Route 66, Suite 102
Neptune, NJ 07753
Phone: (732) 774-6443
Fax: (732) 774-7155
Attorneys for Plaintiff

4. Defendant, U.S. Air Force, is an entity duly organized and existing under the laws of the United States of America, having its principal place of business at 5656 Texas Avenue, Fort Dix, New Jersey.

5. This matter in controversy arose out of a motor vehicle accident on Interstate 195 at Milepost 32 in Howell Township, Monmouth County, New Jersey. As such, the proper venue is the United States District Court, District of New Jersey, Trenton Vicinage.

6. By letter dated July 18, 2017, plaintiff's claim was denied by the Department of the Air Force, Headquarters Air Force Legal Operations Agency.

CAUSE OF ACTION

COUNT ONE

7. At all times hereinafter mentioned, and at all times relevant herein, on or about September 12, 2016, plaintiff, PATRICIA PALMER was the owner and operator of a 2015 Nissan vehicle, bearing license plate number T46FLW, which was traveling on Interstate 195 at or near Milepost 32, in the Township of Howell, County of Monmouth, State of New Jersey.

8. At all times relevant herein, and on the date aforesaid, defendant, U.S. AIR FORCE was the owner and co-defendant, ARNOLD C. YOUNG was the operator of a certain 2004 GMC vehicle, bearing license plate number G820664A, which was traveling on Interstate 195 at or near Milepost 32, in the Township of Howell, County of Monmouth, State of New Jersey.

Bruce P. Fromer, Esq.
Attorney ID# 009271983
Nelson, Fromer, Crocco & Jordan
2300 Route 66, Suite 102
Neptune, NJ 07753
Phone: (732) 774-6443
Fax: (732) 774-7155
Attorneys for Plaintiff

9. At all times relevant herein, the defendant, U.S. AIR FORCE, 5656 Texas Avenue, Fort Dix, New Jersey 08640, was a Governmental entity, organized under the laws of the United States of America and was authorized to transact business in the State of New Jersey, which it did.

10. A Notice of Claim has been served upon the defendants in regard to the within action pursuant to the appropriate statutes.

11. At all times relevant herein and on the date aforesaid, upon information and belief, the defendant, ARNOLD C. YOUNG, was in the course of his employment/service and possession and control of the aforesaid vehicle at the time of the accident, or alternatively acting in an individual capacity, which was, upon information and belief, owned by defendants, U.S. AIR FORCE and was otherwise the agent, servant, representative, employee and/or permissive user of the aforesaid automobile for and on behalf of the defendants, U.S. AIR FORCE.

12. At the time and place aforesaid, the defendants, each of them, maintained, assigned, entrusted, and controlled the vehicle in such a careless, reckless and negligent manner so as to cause a collision to occur.

13. The defendants were negligent, inter alia, in causing their vehicle to strike the plaintiff's vehicle; failure to make a proper lane change; failing to make proper observations of the vehicles operated by others; failing to make proper road observations; failing to maintain their vehicle under proper control; failing to use due care and circumspection; failing to follow automobile operation procedures and adhere

Bruce P. Fromer, Esq.
Attorney ID# 009271983
Nelson, Fromer, Crocco & Jordan
2300 Route 66, Suite 102
Neptune, NJ 07753
Phone: (732) 774-6443
Fax: (732) 774-7155
Attorneys for Plaintiff

to road traffic regulations; failing to supervise; failing to act prudently; and otherwise failing to operate, maintain and control their vehicle in a careful and prudent manner.

14. As a direct and proximate result of the defendants' negligence and carelessness as aforesaid, plaintiff, PATRICIA PALMER was caused to sustain severe physiological and psychological injuries, which have continued to the present, and which will in the future so continue, with concomitant pain and suffering and a shocking to her nervous system, which have caused the plaintiff great pain and suffering. Moreover, plaintiff has been caused to incur, with the possibility of future surgery, and past, present and future loss of income, for which the defendants should be held liable.

WHEREFORE, plaintiff, PATRICIA PALMER demands judgment against the defendants, for damages, jointly and severally, interest, attorney's fees and costs of suit.

SECOND COUNT

15. Plaintiff hereby repeats and realleges the allegations of the First Count of the Complaint as though the same were fully set forth herein at length.

15. The defendant, John Doe and ABC, Inc., are fictitious names intended to identify any and all parties, and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants herein, were responsible for, or in any way, caused or contributed to plaintiff's injuries.

16. As a direct and proximate result of the negligence of the defendants as aforesaid, the plaintiff has suffered serious and permanent personal injuries; have

Bruce P. Fromer, Esq.
Attorney ID# 009271983
Nelson, Fromer, Crocco & Jordan
2300 Route 66, Suite 102
Neptune, NJ 07753
Phone: (732) 774-6443
Fax: (732) 774-7155
Attorneys for Plaintiff

suffered and will in the future suffer great pain; has been and will in the future be forced to expend large sums of money for medical care and attention; have lost and will in the future lose large sums of money for wages; and have been and will in the future be unable to attend to her usual pursuits and occupation.

WHEREFORE, plaintiff, PATRICIA PALMER, demand judgment against the defendants, jointly, severally or, in the alternative, for damages, interest, costs of suit, attorney's fees and such other and further relief as this Court may deem equitable and just.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that the plaintiff hereby demands a trial by jury as to all issues raised by the within matter.

DESIGNATION OF TRIAL COUNSEL

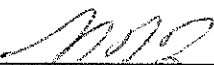
PURSUANT to R. 4:25-4, notice is hereby given that Bruce P. Fromer, Esq., is designated as trial counsel for and on behalf of the plaintiff in the within matter.

CERTIFICATION

PURSUANT to Court Rule, I hereby certify that the matter in controversy is not the subject of any other action or arbitration proceeding filed by the plaintiff, either now or contemplated.

NELSON, FROMER, CROCCO & JORDAN
Attorneys for Plaintiffs

Dated: January 2, 2018

By: 

Bruce P. Fromer, Esq.
Attorney ID# 009271983